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Apple TRANSPORT

September 10, 2020

Jocelyn G. Boyd, Esquire
Chief Clerk & Administrator
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, South Carolina 29210

RE: Reply to the Petition of the Office of Regulatory Staff to Revoke
Certificates of Public Convenience and Necessity of Certain
Motor Carriers Docket No: ~~2020-214~~ - T

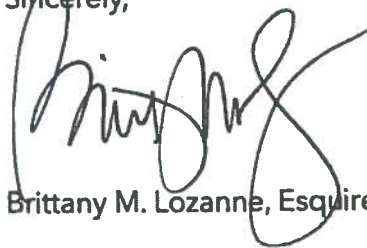
2020-213-T

Dear Ms. Boyd,

Please find enclosed for filing in your office, Apple Transport's Reply to the Office of Regulatory Staff's Petition to Revoke Certificates of Public Convenience and Necessity of Certain Motor Carriers that are out of compliance for failure to maintain and provide evidence of insurance.

Please do not hesitate to contact me should you have any questions.

Sincerely,



Brittany M. Lozanne, Esquire

RECEIVED

SEP 14 2020

PSC SC
MAIL / DMS

PO Box 446 Blythewood, SC 484-824-2139

cc: All Parties of Record (via e-mail)

David Butler, Esquire (via e-mail)

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2020-²¹³-214- T

IN RE:)
)
Petition of the Office of Regulatory Staff)
to Revoke Certificates of Public)
Convenience and Necessity of Certain)
Motor Carriers For Failure to Maintain)
and File Evidence of Insurance.)
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**RESPONDENT'S ANSWER TO
PETITION FOR REVOCATION OF
CERTIFICATES OF PUBLIC
CONVENIENCE AND NECESSITY
OF CERTAIN MOTOR CARRIERS**

Respondent by filing this Answer respectfully admits in part and denies in part the allegations contained in said Petition before the Public Service Commission of South Carolina ("Commission"):

1. Admitted.
2. On or about September 30, 2019, Apple Transport ceased all meaningful business operations and began the process of winding up with only liquidating remaining at the current time. It is no longer operating any "motor vehicle carriers" as defined by the S.C. Code.

3. On or about September 30, 2019, Apple Transport ceased all meaningful business operations and began the process of winding up with only liquidation remaining presently. Respectfully, Apple Transport wishes to cancel its' Certificate PC&N, which is under the Commission's jurisdiction. Opposing Counsel indicated no opposition to this request.
4. On or about September 30, 2019, Apple Transport ceased all meaningful business operations and is no longer operating in a capacity that would necessitate motor vehicle insurance. Only the process of liquidation remains at currently.
5. Because Apple Transport is in the process of liquidation, it respectfully requests to cancel its' Certificate PC&N, which is under the Commission's jurisdiction. Opposing Counsel indicated no opposition to this request.
6. Admitted. On or about September 30, 2019, Apple Transport ceased all meaningful business operations and only the process of liquidation remains.
7. Admitted. On or about September 30, 2019, Apple Transport ceased all meaningful business operations and did not subsequently operate without insurance and/or compliance to the Commission's regulations. It simply began the process of winding up. Apple Transport begs the Commission's indulgence for any failure to notify of closure prior to its' Response.
8. Because Apple Transport is in the process of liquidation, it respectfully requests to cancel its' Certificate PC&N, which is under the Commission's jurisdiction. Opposing Counsel indicated no opposition to this request.

9. Denied. On or about September 30, 2019, Apple Transport ceased all meaningful business operations and did not subsequently operate without insurance or willfully violate or refuse to observe state law, but only began the process of closing down its' business. Apple Transport begs the Commission's indulgence for any failure to notify of closure prior to its' Response.
10. Admitted.
11. Admitted.

WHEREAS, Apple Transport respectfully requests that the Honorable Commission:

1. Approve Apple Transports request to cancel its' Certificate PC&N under the Commission's jurisdiction in order to become compliant in lieu of operations ceasing September 30, 2019.
2. Further remove Apple Transport as party to this Petition necessitating further response.

Dated: 9/18/20
Blythewood, SC

BY: 

Brittany M. Lozanne, Esquire
Counsel for Apple Transport
PO Box 446
Blythewood, S.C. 29016
484-824-2139
Email: AppleTransportSC@Yahoo.com

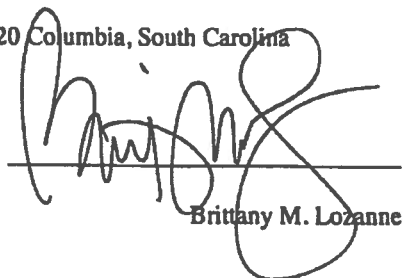
BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2020 - 214- T

IN RE:

Petition of the Office of Regulatory Staff
to Revoke Certificates of Public
Convenience and Necessity of Certain
Motor Carriers For Failure to Maintain
Insurance

CERTIFICATE OF SERVICE

This is to certify that I, Brittany M. Lozanne, have this date served one (1) copy of the PETITION FOR REVOCATION OF CERTAIN CERTIFICATES OF PUBLIC CONVENIENCE AND NECESSITY OF CERTAIN MOTOR CARRIERS FOR FAILURE TO MAINTAIN INSURANCE in the above-referenced matter to the person(s) named below by causing said copy to be deposited in the United States Postal Service, first class postage prepaid and affixed thereto, and addressed as shown below: Cover Letter, Respondent's Answer Brittany M. Lozanne September 10, 2020 Columbia, South Carolina


Brittany M. Lozanne

September 10, 2020
Blythewood, South Carolina

Apple TRANSPORT

September 10, 2020

Jocelyn G. Boyd, Esquire
Chief Clerk & Administrator
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, South Carolina 29210

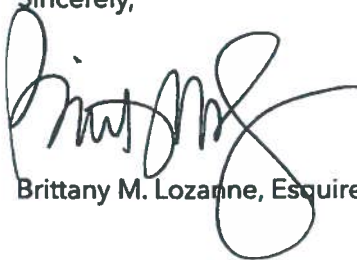
RE: Reply to the Petition of the Office of Regulatory Staff to Revoke
Certificates of Public Convenience and Necessity of Certain
Motor Carriers Docket No: 2020-213-T
214-T

Dear Ms. Boyd,

Please find enclosed for filing in your office, Apple Transport's Reply to the Office of Regulatory Staff's Petition to Revoke Certificates of Public Convenience and Necessity of Certain Motor Carriers that are out of compliance for non-payment of decal fees. ✓

Please do not hesitate to contact me should you have any questions.

Sincerely,



Brittany M. Lozanne, Esquire

PO Box 446 Blythewood, SC 484-824-2139

cc: All Parties of Record (via e-mail)
David Butler, Esquire (via e-mail)

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

DOCKET NO. 2020 - ~~213~~ - T
214

IN RE:

Petition of the Office of Regulatory Staff
to Revoke Certificates of Public
Convenience and Necessity of Certain
Motor Carriers For Non-Payment of Decal
Fees

**RESPONDENT'S ANSWER TO
PETITION FOR REVOCATION OF
CERTIFICATES OF PUBLIC
CONVENIENCE AND NECESSITY
OF CERTAIN MOTOR CARRIERS**

Respondent respectfully admits in part and denies in part the allegations contained in said Petition before the Public Service Commission of South Carolina ("Commission"):

1. Admitted.
2. On or about September 30, 2019, Apple Transport ceased all meaningful business operations and began the process of winding up with only liquidating remaining at the current time. It is no longer operating any "motor vehicle carriers" as defined by the S.C. Code.

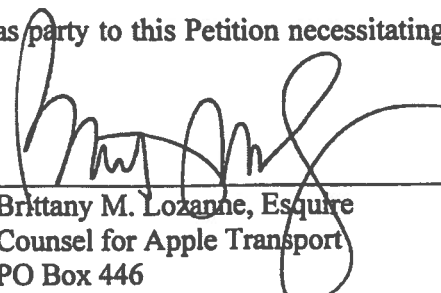
3. On or about September 30, 2019, Apple Transport ceased all meaningful business operations and began the process of winding up with only liquidation remaining presently. Respectfully, Apple Transport wishes to cancel its' Certificate PC&N, which is under the Commission's jurisdiction and would accordingly request to be relieved of its requirement of Decal Fee payments. Opposing Counsel indicated no opposition to this request.
4. Admitted.
5. On or about September 30, 2019, Apple Transport ceased all meaningful business operations and began the process of winding up with only liquidation remaining presently. Respectfully, Apple Transport wishes to cancel its' Certificate PC&N, which is under the Commission's jurisdiction and would accordingly request to be relieved of its requirement of Decal Fee payments. Opposing Counsel indicated no opposition to this request.
6. Admitted. However, on or about September 30, 2019, Apple Transport ceased all meaningful business operations and only the process of liquidation remains.
7. Admitted. On or about September 30, 2019, Apple Transport ceased all meaningful business operations and did not subsequently operate without insurance and/or compliance to the Commission's regulations. It simply began the process of winding up. Apple Transport begs the Commission's indulgence for any failure to notify of closure prior to its' Response.

8. Because Apple Transport is in the process of liquidation, it respectfully requests to cancel its' Certificate PC&N, which is under the Commission's jurisdiction. Opposing Counsel indicated no opposition to this request.
9. Denied. On or about September 30, 2019, Apple Transport ceased all meaningful business operations and did not subsequently operate without insurance or willfully violate or refuse to observe state law, but only began the process of closing down its' business. Apple Transport begs the Commission's indulgence for any failure to notify of closure prior to its' Response.
10. Admitted.

WHEREAS, Apple Transport respectfully requests that the Honorable Commission:

1. Approve Apple Transports pending request to cancel its' Certificate PC&N under the Commission's jurisdiction in order to become compliant in lieu of operations ceasing September 30, 2019.
2. Relieve Apple Transport of its requirement of Decal Fee payments.
3. Further remove Apple Transport as party to this Petition necessitating further

response.
 Dated: 9/10/20
 Blythewood, SC

BY: 
 Brittany M. Lozanne, Esquire
 Counsel for Apple Transport
 PO Box 446
 Blythewood, S.C. 29016
 484-824-2139
 Email: AppleTransportSC@Yahoo.com

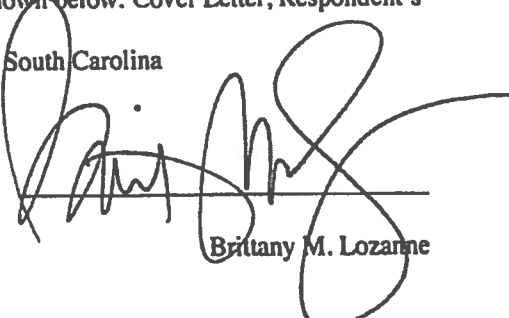
BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2020 - 213- T

IN RE:

Petition of the Office of Regulatory Staff
to Revoke Certificates of Public
Convenience and Necessity of Certain
Motor Carriers For Non-Payment of Decal
Fees

CERTIFICATE OF SERVICE

This is to certify that I, Brittany M. Lozanne, have this date served one (1) copy of the PETITION FOR REVOCATION OF CERTAIN CERTIFICATES OF PUBLIC CONVENIENCE AND NECESSITY OF CERTAIN MOTOR CARRIERS FOR FAILURE TO PAY DECAL FEES in the above-referenced matter to the person(s) named below by causing said copy to be deposited in the United States Postal Service, first class postage prepaid and affixed thereto, and addressed as shown below: Cover Letter, Respondent's Answer Brittany M. Lozanne September 10, 2020 Columbia, South Carolina


Brittany M. Lozanne

September 10, 2020
Blythewood, South Carolina